

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

---

SHARON MCDONALD, )  
Plaintiff, )  
v. ) Civil Action No. 1:15-CV-11915-JGD  
CITY OF BOSTON and RICHARD )  
WALKER, )  
Defendants. )  
\_\_\_\_\_  
)

**DEFENDANT RICHARD WALKER'S MOTION FOR SUMMARY JUDGMENT**

Now comes Defendant Richard Walker (“Walker”) and hereby moves, pursuant to Federal Rule of Civil Procedure 56, that this Court enter summary judgment in Defendant’s favor on Plaintiff Sharon McDonald’s (“Plaintiff”) Complaint. As grounds therefore, Walker states that there are no genuine issues of material fact and that Walker is entitled to judgment as a matter of law. In support of his motion, Walker relies upon his accompanying Memorandum of Law and supporting affidavits and exhibits filed contemporaneously herewith.

WHEREFORE, Defendant Richard Walker respectfully requests that this Court enter summary judgment in his favor on all of the claims in Plaintiff’s Complaint, and for such other relief as this Court deems just and proper.<sup>1</sup>

*[SIGNATURES ON FOLLOWING PAGE]*

---

<sup>1</sup> Pursuant to an Opinion and Order dated November 12, 2015, this Court dismissed Count V (alleging negligent infliction of emotional distress) against Walker. Walker now moves for summary judgment on the remaining counts against him in Plaintiff’s complaint.

Respectfully submitted,

Richard Walker,

By his attorney,

/s/ William T. Hogan III

William T. Hogan III (BBO# 237710)

bill.hogan@nelsonmullins.com

Nelson Mullins Riley & Scarborough LLP

One Post Office Square, 30th Floor

Boston, MA 02109

(617) 217-4700

(617) 217-4710

Dated: February 28, 2018

**RULE 7.1 CERTIFICATION**

On February 27, 2018, counsel for Defendant Richard Walker conferred with Plaintiff's counsel by email in an effort to narrow or resolve the issues in Walker's Motion for Summary Judgment. However, we were unable to resolve the issues.

/s/ William T. Hogan III

William T. Hogan III

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on this date.

Dated: February 28, 2018

/s/ William T. Hogan III

William T. Hogan III